

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001 :  
: :  
: **1:03 MDL 1570 (GBD)(SN)**  
: :  
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**This Document Relates to**  
**Havlish, et al. v. Iran, et al.**  
**1:03-cv-9848 (GBD)(SN)**  
***Expedited Review Requested***

**NOTICE OF UNOPPOSED MOTION TO LIFT STAY  
OF JUDICIAL ENFORCEMENT OF WRIT OF EXECUTION**

PLEASE TAKE NOTICE that upon the attached Memorandum of Law, Declaration of Douglass A. Mitchell, and exhibits thereto, the undersigned attorneys for Movant-Creditors Fiona Havlish, et al., (the “Havlish Creditors”) shall move this Court, before the Honorable Sarah Netburn, United States Magistrate Judge for the Southern District of New York, at the Thurgood Marshall United States Courthouse located at 40 Foley Square, New York, New York 10007, for an Order lifting the stay of enforcement of their duly-entered, served, and levied writ of execution against the assets in which the Taliban has an interest, including through its agency and instrumentality Da Afghanistan Bank, at the Federal Reserve Bank of New York, only to the extent authorized by Title II of the Terrorism Risk Insurance Act of 2002 (“TRIA”), Pub. L. No. 107–297, 116 Stat. 2322, for an amount equal to the Havlish Creditors’ compensatory damages, and for such other and further relief as the Court deems appropriate. For the reasons described in their Memorandum of Law, the Havlish Creditors request expedited review of this motion on or before February 17, 2022. The United States does not oppose lifting the stay of judicial enforcement,

subject to the views laid out in its Statement of Interest. Declaration of Douglass A. Mitchell (“Mitchell Decl.”), ¶ 7.

Dated: February 14, 2022

Respectfully submitted,

/s/ Lee S. Wolosky

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